As a service provider, InfoTrax collects the personal information of our client's customers and distributors. This information may include, name, address, email address, phone number, birthday, bank account information, authentication information (such as usernames and passwords), website tracking information such as cookies. and Social Security numbers and other government ID (such as a Tax Identification number or Driver's License number).

**How will we use your data?** InfoTrax gathers this information under the direction of our Clients and to perform the services we agree to provide in the contracts with our Clients. The services provided by InfoTrax include:

- Order processing, including order history, shipping processing, and connections with credit card processing services.
- Business organization management- including reporting, relationship maintenance, and messaging services.
- Customer and Distributor Management Enrollment with our clients, identity confirmation, account management, AR management.
- Commission Calculation and payment Calculating commission based on personal and organization volume, distributing commissions payments.
- System Diagnostics We may diagnose problems with our applications and servers and to administer our website.
- InfoTrax may also use the information to offer and provide supplemental services directly to distributors.

**How do collect your data?** We collect data through our website or websites, through our clients' websites or other third-party providers, and through information being entered into our application in our clients call centers. We collect personal data when an individual enrolls with, orders from, or otherwise provides information to our clients.

**How do we store your information?** Information is stored in a secure third-party co-location facility, with other third party providers, and on InfoTrax's premises.

## How do we protect your information?

We take appropriate security measures to protect your personal information from unauthorized access, disclosure, alteration, or destruction. We regularly review our security procedures to ensure that they are up-to-date and effective. We contract with independent third parties to audit our systems and procedures.

**Third Parties.** InfoTrax does not sell personal information to third parties. InfoTrax does use trusted third-party providers who may access the information to provide diagnostic, hosting, and development services.

**How long do we keep your data?** InfoTrax will keep your data for as long as it provides services to the Client company with whom you do business, or until instructed to delete the information by the Client, whichever comes first.

**Exercising your rights.** To exercise any rights you have concerning your data, please contact the Client on whose behalf InfoTrax has your data.

**Scope.** This privacy policy applies only InfoTrax and the services it provides, and not to any other entity or services. In particular, InfoTrax processes this data under the direction of the client company, which is not governed by this policy.

**Website and Cookie Data.** We may collect information regarding visitors to our websites and those who send us requests for information. We use cookies to enable the functioning, as well as to assess the performance and usability (analytics) of our websites. We do not use cookies for targeted advertisement.